

## INDUSTRIAL CLASSIFICATION SCHEME

The following criteria and requirements are applicable to the City's Industrial Users.

### **Class 1 - Significant Industrial Users and Categorical Users**

Dischargers of large volumes, high loadings, or chemical constituents warranting a high degree of controls and monitoring. Users with sophisticated automated pretreatment systems are automatically included within this class, but this group may also include lower levels of pretreatment or none at all.

#### **CRITERIA**

**Categorical Standards:** includes all industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N; or

**Flow:** Discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, non-contact cooling and boiler blowdown wastewater); or

**Percent Loading to POTW:** Contributes a process wastestream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or

**Designation by City:** is designated as such by the City on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement; or

**Type of Pretreatment:** Has a pretreatment system that involves automatic controls for sensing, pumping, dosing and/or other treatment functions occurring without the manual intervention of an operator.

#### **REQUIREMENTS**

**Permitting:** Industrial Discharge Permit required (Class I) - three-year term

**Inspections by City:** Annually (minimum requirement)

**Compliance Monitoring by City:** Annually (minimum requirement)

**Self-Monitoring Reports:** As specified in the Permit or as required by Categorical Standards.

### **Class 2 - Minor Industrial Users**

This group is made up of industries that do not fit the definition of Significant but discharge between 1,000 and 25,000 gpd of process wastewater. Also included are dischargers of more than 100 gpd when pretreatment is in place and are not deemed to fit the Class I designation. Pretreatment, if present, requires an operator to manually operate equipment, add chemicals, etc. These industries are kept within the permitting program because the volume or characteristics of their discharges are great enough to warrant tracking to keep up with any changes that could affect their classification.

CRITERIA

**Categorical Standards:** Class 2 cannot be subject to Categorical Standards

**Flow:** Discharges an average of 1,000 (100 if pretreatment is present) to 24,999 gpd of process wastewater to the POTW (excluding sanitary, vehicle washing, and noncontact cooling wastewater); and

**Percent Loading to POTW:** Contributes a process wastestream which makes up less than 5 percent of the average dry weather hydraulic or organic capacity of the POTW; or

**Designation by City:** is designated as such by the City on the basis that changes in status (to an SIU) could occur;

**Type of Pretreatment:** If present, cannot involve sophisticated automatic controls for sensing, pumping, dosing and/or other treatment functions occurring without the manual intervention of an operator.

REQUIREMENTS

**Permitting:** Industrial discharge Permit required - up to a five-year term.

**Inspections by City:** At least once every three years

**Compliance Monitoring:** by City: Prior to permit renewal and as specified in the Permit

**Self-monitoring reports:** Required with Permit reapplication and as specified in the Permit

**Class 3 - General Permit Industrial Users**

These industries are small dischargers who may require simple pretreatment procedures (batch pH adjustment, oil/sand separators, silver recovery units, grease traps, cooling towers etc.) with process flows less than 100 gpd (greater for vehicle washing). It also includes discharges up to 1,000 gpd when no pretreatment is needed.

Pretreatment will sometimes be in place for unplanned discharges, such as an oil spill, or it may be present to protect internal building plumbing from corrosion or blockages or other problems when the discharge is not large enough to cause problems to the POTW. The pretreatment may also be of a passive type. These would include a filter (which would plug up when it needs to be changed) or a resin bed (on contract for periodic servicing). A Class 3 Permit would be needed for filter and resin beds where an awareness of its presence and need for attention should to be reinforced by a permit condition. Best Management Practices (BMPs) (spill prevention, off-site shipping for disposal of certain materials, etc.) may be included.

General Permits will have a "Special Conditions" section that will be specific in nature and pertain to a specific class of user. A General Permit will have a five-year expiration date, be signed by the General Permit User and require conditions specific to that type of use. Following are examples of businesses that could receive a General Permit:

- **Dentist Offices** - Mercury recovery for fillings and Silver recovery for X-ray development
- **Automotive Shops** - Glycol disposal, oil & filter disposal, parts cleaner service, transmission and rear end fluid disposal, product storage and floor drains

- **Doctor Offices** (to include Chiropractic) - Silver recovery for X-ray development and blood borne products
- **Photo Developers** - Silver recovery for developing and neutralization of developer and fixer
- **Cooling Towers** - Inhibiting Chemicals used, annual cleaning, glycol overflows
- **Vehicle Washing** - Small car and truck washing centers

A specific Class 3 Permit may be issued to an IU where there is a need for plans to prevent accidental discharges that could have the potential for causing problems at the POTW. This could include otherwise dry users with significant chemical storage on site. These permits will be issued for a period of up to five years with specific conditions to that Industrial User.

Issuance of a general permit will give the permittee a simplified permit outlining key Pretreatment Points such as notification of the POTW if a spill occurs and the requirement to obtain approval for significant changes in the character of the discharge (see attached Class III Permit).

### CRITERIA

**Categorical Standards:** Class 3 cannot be subject to Categorical Standards

**Flow:** Discharges an average of 100 gpd of process wastewater or more than 1,000 gpd of process wastewater when pretreatment is not present to the POTW. (excluding sanitary, vehicle washing, and noncontact cooling wastewater); and

**Percent Loading to POTW:** Contributes a process wastestream which makes up less than 5 percent of the average dry weather hydraulic or organic capacity of the POTW; or

**Designation by City:** is designated as such by the City; or

**Type of Pretreatment:** If present, requires only infrequent maintenance (such as cartridge renewal, trap cleanout) to remain functional. Permit Special Conditions may have BMP requirements.

### REQUIREMENTS

**Permitting:** Industrial discharge Permit required - five-year term for specific designated Class 3 Permittees.

**Inspections by City:** Inspect before, or within 90 days, of issuance of five-year permit. Random inspection(s) thereafter if needed for non-expiring permits.

**Compliance Monitoring:** Random at discretion of Control Authority

**Self-monitoring reports:** As specified in Permit (may include service records, discharge logs, manifests, etc.)

### Class IV - Exempted Industrial Users

Those businesses with non-domestic wastewater and have been eliminated from further consideration as a Class 3 user because:

- a) Pollutants of concern would not likely be present in the users effluent

- b) Pollutants may be present in trace amounts, but are highly unlikely to cause interference or pass-through at the POTW
- c) Effluent discharge comprises conventional pollutants (BOD, TSS, O&G, NH<sub>3</sub> etc.) that are compatible with the POTW
- d) Effluent Discharge is domestic wastewater only
- e) Warehouse operations with no discharge

These establishments will require no further inspection, sampling or self-monitoring reporting within the approved EPA IPP. A periodic survey may be sent to these businesses to support future Exempt User status.